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### REMARKS

The Office Action dated June 5, 2006 has been received and considered. Reconsideration of the outstanding rejection in the present application is respectfully requested based on the following remarks.

#### Allowability of Claims 23-30

The Applicant notes with appreciation the indication at page 2 of the Office Action that claims 23-30 are allowed. Applicant further notes with appreciation the indication that claims 8-9, 15, 17, and 32-34 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. The Applicant has opted to forgo rewriting these claims as suggested in view of the following remarks.

#### Obviousness Rejection of Claims 1, 3-7, 10, 11, 13, 14, 18-21, 31, 35 and 36

At page 2 of the Office Action, claims 1, 3-7, 10, 11, 13, 14, 18-21, 31, 35 and 36 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Bondy et al. (U.S. Patent No. 5,491,813) in view of Keller et al. (U.S. Patent No. 5,752,032) further in view of Schoening et al. (U.S. Patent No. 6,226,788). This rejection is hereby respectfully traversed.

Claim 1 recites identifying a particular device-specific driver portion from a plurality of driver portions associated with the device identifier based on a comparison of versions associated with functions of the device-specific driver portion to versions expected through an application program interface. As indicated by the Office Action at page 3, these elements are not disclosed or suggested by Bondy or Keller. These elements are also not disclosed or suggested by Schoening.

The Office Action at page 4 asserts that these elements are disclosed by the "device mapping table" of Schoening. Applicant respectfully traverses this assertion. Schoening discloses a "Device Mapper", which is a table associated with a device in a network. *Schoening*, col. 13, lines 59-66. The device mapper identifies Service Module Functions that are overridden for the associated device. *Id.* According to Schoening, the Service Module Functions are "overridden functions of a service module." *Id.* at col. 6, lines 64-65. A service module "means a set of classes derived from the Framework and FrontEnd packages that define the API, data

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model, database, and abstract functions that implement network device services.” *Id.* at col. 6, lines 60-63 (emphasis added). Further, the FrameWork “means the set of classes, in an object-oriented computer programming language, and services from which the organization and structure of a Service module is derived. In particular, a FrameWork *defines the structure of an API* and internal dispatch mechanisms.” *Id.*, col. 6, lines 42-46 (emphasis added). For a particular device version, the Schoening system can determine which Device Mapper applies for that device version. *Id.* at col. 17, lines 16-28.

Thus, the system of Schoening identifies, for a particular device version, a set of *application program interface functions* that will be overridden for the associated device. Schoening does not disclose or suggest identifying a particular *device-specific driver portion* from a plurality of driver portions associated with the device identifier *based on a comparison of versions associated with functions of the device-specific driver portion to versions expected through an application program interface* as recited in claim 1. Instead, the Schoening system identifies *API functions that will be overridden* based on a comparison of a *device version to a number of Device Mapper tables*. Accordingly, Bondy, Keller, and Schoening individually and in combination, fail to disclose or suggest each and every element of claim 1.

Claims 3-7, 10, and 11 depend from claim 1. Accordingly, Bondy, Keller, and Schoening, individually and in combination, fail to disclose or suggest each and every element of claims 3-7, 10, and 11, at least by virtue of their dependency on claim 1. In addition, these claims recite additional novel elements.

Claim 13 recites providing a table linking device identifiers to individual device-specific driver portions of the plurality of device-specific driver portions. These elements are not disclosed by Bondy, Keller, and Schoening. Neither Bondy nor Keller disclose providing a table linking device identifiers to driver portions. Further, the Device Mapper table of Schoening identifies *functions of an API to be overridden*, rather than linking device identifiers to individual device-specific driver portions of the plurality of device-specific driver portions. Accordingly, Bondy, Keller, and Schoening, individually and in combination, fail to disclose or suggest each and every element of claim 13.

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Claims 14 and 18-21 depend from claim 13. Accordingly, Bondy, Keller, and Schoening, individually and in combination, fail to disclose or suggest each and every element of claims 14 and 18-21, at least by virtue of their dependency on claim 13. In addition, these claims recite additional novel elements.

Claim 31 recites a third function to manipulate a processor to identify a particular device-specific driver by locating a name associated with the particular device-specific driver portion in a table using the device identifier. Neither Bondy nor Keller disclose identifying a particular device-specific driver by locating a name associated with the particular device-specific driver portion in a table. Further, the Device Mapper table of Schoening identifies *functions of an API to be overridden*, rather than identifying a particular device-specific driver by locating a name associated with the particular device-specific driver portion in a table using the device identifier. Accordingly, Bondy, Keller and Schoening, individually and in combination, necessarily fail to disclose or suggest a third function to manipulate a processor to identify a particular device-specific driver by locating a name associated with the particular device-specific driver portion in a table using the device identifier as recited in claim 31.

Claims 35 and 36 depend from claim 31. Accordingly, Bondy, Keller, and Schoening, individually and in combination, fail to disclose or suggest each and every element of claims 35 and 36, at least by virtue of their dependency on claim 31. In addition, claims 35 and 36 recite additional novel elements.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 1, 3-7, 10, 11, 13, 14, 18-21, 31, 35 and 36 is improper. Withdrawal of the rejection and reconsideration of the claims therefore is respectfully requested.

**Obviousness Rejection of Claim 16**

At page 6 of the Office Action, claim 16 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Bondy et al. in view of Keller et al. further in view of Shirakabe et al. This rejection is hereby respectfully traversed.

Claim 16 depends from claim 13. As explained above, neither Bondy nor Keller disclose or suggest each and every element of claim 13. Further, Shirakabe does not remedy the

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deficiency of Bondy and Keller. Accordingly, the cited references fail to disclose or suggest each and every element of claim 16, at least by virtue of its dependency on claim 13. In addition, claim 16 recites additional novel elements.

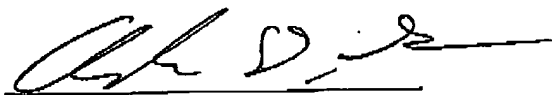
In view of the forgoing, it is respectfully submitted that the obviousness rejection of claim 16 is improper. Withdrawal of the rejection and reconsideration of the claim therefore is respectfully requested.

**Conclusion**

The Applicants respectfully submit that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

The Commissioner is hereby authorized to charge any fees that may be required, or credit any overpayment, to Deposit Account Number 50-0441.

Respectfully submitted,



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Date